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Office of the Secretary  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

RE: Docket No. 95-176

Dear Sirs:

I would like to make two comments regarding the Telecommunications Act, specifically two areas regarding closed captioning:

1. TRANSITION SCHEDULE. Eight (8) years is more than enough time to phase in captioning. In fact, it can be phased in in less time. Working with organizations and video producers in the St. Louis area for over three years now, we find more and more people wanting captioning but the producers adamantly digging in their feet and saying no. They usually cite cost and lack of time in the production schedule to accomplish captioning. Upon explaining the cost and the process of captioning to the organizations and/or producers, taking special care to emphasize we will work with anyone's schedule, inevitably we get the same reaction: the organizations are delighted to find out how little captioning costs when compared to making the total video and recognize their civic responsibility and almost always give the go-ahead to include captioning. The video producers, on the other hand, act as though we are out to destroy a great American institution by insinuating that video is not perfect just the way it has been produced and proceed to get very defensive. We've actually had the producer of some educational videos in St. Louis tell us, "But you'll ruin my pretty picture." When we explained that many people won't even watch his pretty picture if they can't turn on the captioning, we find he has already turned out the lights in his head for the night.

The issue of needing more time to phase in captioning is a smoke screen.

2. NONTECHNICAL QUALITY STANDARDS. Many video people do not respect the printed word. It's why they make video. It's also the main reason they don't want captioning implemented.

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Yet, if captioning must be implemented, these companies want to pull the receptionist off the front desk and have her caption. Her only credentials are that she is female and can type. Because this person does not understand captioning as a communication tool, she makes no effort to identify who is speaking, or break the captioning into readable bites, or take care not cover up other graphics on the screen. Communication cannot be accomplished by poor captioning. In fact, the only thing that results when producers are left to do their own captioning is they are able to pay down on their expensive video equipment by charging industry rates for slapping words on the bottom of the screen and calling it "captioning."

There are many high quality companies poised and ready to do business as captioners. They love and understand the English language and are willing to spend the time it takes to communicate by printed word. The smoke screens thrown up by the video industry are only that. They will dissipate if only you have the courage to implement a strong policy. If not, you will spend the next twenty years correcting the problems that you are implementing from the start.

In the end it's easier to be proactive and not reactive.

Sincerely,



Susan M. Rick,  
President

SMR/bmm